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June 11, 2018

**VIA ECF**

Hon. Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Centauro Liquid Opportunities Master Fund L.P. v. Bazzoni*,  
No. 15 Civ. 9003 (LTS) (SN)

Dear Judge Netburn:

My firm represents defendant Elemento Ltd. (“Elemento”). With the consent of all parties, I am writing to seek the Court’s approval for a modest adjustment of the pending discovery schedule. For a combination of both personal and professional reasons, we seek to defer the deposition of Elemento’s Rule 30(b)(6) witness, Carlos Galindez, by one week, until June 22, 2018. Plaintiff has also noticed the deposition of Mr. Galindez in his personal capacity.

Mr. Galindez resides in Venezuela. While we understand the plaintiff will examine Mr. Galindez remotely, it is my intention to meet with Mr. Galindez personally outside of the United States in anticipation of that deposition and to be by his side during that deposition. My personal (and other professional) commitments make this week especially problematic for these activities.

All parties consent to the adjournment.

The Court recently indicated its reluctance to approve further depositions beyond June 15, 2018, and has earlier provided two extensions of the discovery period. Even with the requested extension, however, Mr. Galindez’s deposition will be completed before the last scheduled deposition in this case, i.e., the June 27, 2018 deposition of plaintiff’s principal, Yvonne Morabito. In addition, the request for the adjournment of Mr. Galindez’s deposition is related to my own personal situation and not the actions of the parties in the case.

For these reasons, I respectfully request that the Court approve an adjournment of Mr. Galindez’s June 15, 2018 deposition, in both his individual and corporate representative capacity, until June 22, 2018.

Respectfully yours,

/s/Michael T. Sullivan

Michael T. Sullivan

cc: All counsel of record, via ECF